



U.S. Department of Justice

United States Attorney
Southern District of New York

The Jacob K. Javits Federal Building
26 Federal Plaza, 37th Floor
New York, New York 10278

August 26, 2024

BY ECF

The Honorable George B. Daniels
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

The Honorable Lewis A. Kaplan
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Ryan Salame, S7 22 Cr. 673 (LAK)*
United States v. Michelle Bond, 24 Cr. 494 (GBD)

Dear Judge Daniels and Judge Kaplan:

The Government respectfully submits this letter to alert the Court to factually related cases pending before Your Honors.

In September 2023, defendant Ryan Salame waived indictment and consented to the filing of Superseding Information, S7 22 Cr. 673 (the “Salame Case”), charging him with conspiracy to make unlawful political contributions and defraud the Federal Election Commission, and conspiracy to operate an unlicensed money transmitting business, in a case pending before Judge Kaplan. Salame pleaded guilty to both counts pursuant to a plea agreement (the “Salame Plea Agreement”) in which Salame admitted to certain uncharged conduct. On May 28, 2024, Judge Kaplan sentenced Salame principally to 90 months’ imprisonment.

Last week, a grand jury sitting in this district returned Indictment 24 Cr. 494 (the “Bond Case”), charging defendant Michelle Bond with conspiring to cause and causing unlawful campaign contributions in connection with her unsuccessful run for Congress in 2022. Certain of the uncharged conduct described in the Salame Plea Agreement overlaps factually with the charges in the Bond Case. The Indictment in the Bond Case was unsealed on August 22, 2024, at which time the Bond Case was assigned to Judge Daniels.

On August 21, 2024, after the grand jury returned the Indictment in the Bond Case but before the Indictment was unsealed, Salame filed a petition for a writ of error *coram nobis* in the Salame Case, seeking “[a]n order dismissing with prejudice any indictment of Michelle Bond for the campaign-finance offenses the investigation of which was supposed [sic] be concluded by Salame’s guilty plea in this case” or in the alternative “an order vacating and setting aside the judgment of conviction entered against Salame on May 28, 2024,” among other things. Salame Case, Dkt. 470 at 26. Salame’s petition is premised on the (demonstrably false) allegation that he was induced to plead guilty based on representations by the Government that in exchange for

pleading guilty, the Government would cease investigating Bond for conspiring with Salame to commit criminal campaign finance violations. The Government intends to oppose Salame's petition in writing by September 4, 2024, in advance of the oral argument scheduled before Judge Kaplan on September 12, 2024, at 10:00 a.m. See Salame Case, Dkt. 475.

Respectfully submitted,

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cc: All counsel of record (by ECF)